

**UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Appellee,</b>	)	
	)	
<b>v.</b>	)	<b>No. 21-3032</b>
	)	
<b>THEODORE DOUGLAS,</b>	)	
	)	
<b>Appellant.</b>	)	

**UNOPPOSED MOTION FOR 60-DAY EXTENSION OF TIME  
WITHIN WHICH TO FILE APPELLANT’S OPENING BRIEF**

Appellant Theodore Douglas, through undersigned counsel, respectfully moves this Court, pursuant to Circuit Rule 27(h), for a 60-day extension of time, from January 25, 2022, to March 25, 2022 to file his opening brief.

As grounds for this motion, undersigned counsel states:

1. Mr. Douglas pled guilty in this matter to possession of a firearm by a person previously convicted of a felony in violation of 18 U.S.C. § 922(g), and on May 24, 2021 was sentenced to 15 months’ incarceration followed by three years’ supervised release. Though Mr. Douglas has completed his sentence in this matter, he remains incarcerated on Superior Court matter.
2. This Court set a briefing schedule under which appellant’s opening

brief is due on November 26, 2021.

3. Over the past five weeks, Mr. Douglas has been in and out of quarantine due to the coronavirus, which has made communication with him difficult. Each scheduled call of many with Mr. Douglas has been cancelled or rescheduled according to protocols at the D.C. Jail. These unanticipated impediments to communication with Mr. Douglas place counsel in the position of not having completed consultation with Mr. Douglas necessary for finalizing the opening brief. Counsel anticipates that with the additional requested time, he will be able to work through the logistical difficulties of communicating with Mr. Douglas, which will allow him to file the opening brief.

4. Counsel for the government has indicated that it does not oppose this request for extension of time.

WHEREFORE, appellant respectfully requests that this Court grant his motion for a 60-day extension of time to file his opening brief and order it due no sooner than March 25, 2022.

Respectfully submitted,

A. J. KRAMER  
FEDERAL PUBLIC DEFENDER

/s/

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**CERTIFICATE OF COMPLIANCE  
WITH TYPE-VOLUME LIMITATION**

I hereby certify, pursuant to Federal Rule of Appellate Procedure 32(a), that the foregoing Motion for Extension was prepared in monospaced typeface using Microsoft Word in Century Schoolbook 14-point font and contains 290 words in compliance with the Court's type-volume limits.

/s/

TONY AXAM, JR.  
Assistant Federal Public Defender